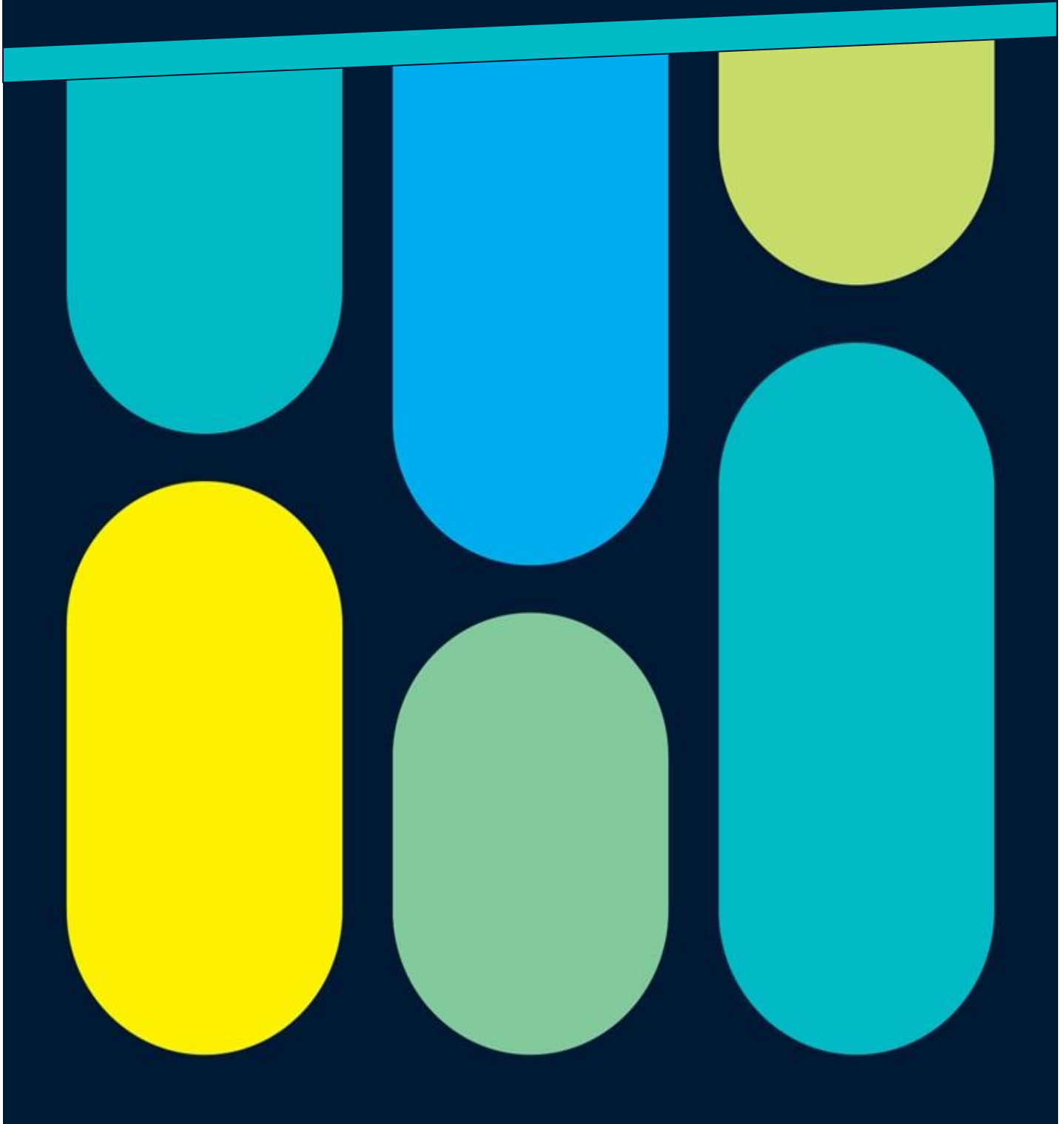


Modern Slavery & Human Trafficking Statement

FINANCIAL YEAR ENDING 30 APRIL 2026

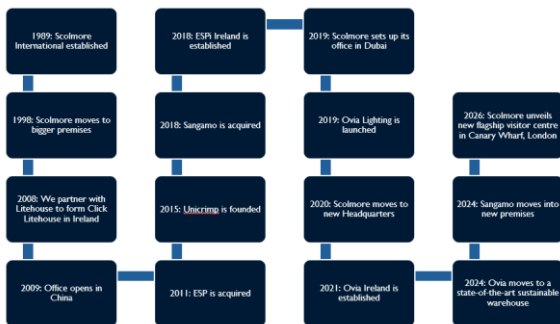


Our Business

Scolmore, a British family-run business, is one of the UK's leading suppliers of electrical accessories, home automation, lighting, security and cable accessory products. From its headquarters in Tamworth, the Group is well positioned to design, manufacture, develop, and distribute its product range nationally and internationally. The company is committed to harnessing the very latest technologies and developing superior performing, competitively priced products which allow installation projects to be completed quickly and easily.

Our Product Development Team are constantly tracking market trends, industry regulations and standards so that we continue to increase our product range to meet the ever-changing needs of our customers, while always considering the lifecycle of our products and their environmental impact throughout the product design process and its use phase.

The Scolmore Group revolves around people, customers and the strong relationships built and maintained through consistent high levels of service and delivery. Our people are at the heart of our organisation, and we are committed to providing a supportive and inclusive environment that fosters growth, creativity, and collaboration.



Organisation's Structure

The Scolmore Group of companies consists of Scolmore (International) Ltd, which is the highest parent, based in Tamworth, Staffordshire (United Kingdom) and the following wholly owned operative subsidiaries:

- Ovia Ltd, based in Tamworth, Staffordshire (UK),
- Elite Security Products Ltd (ESP), based in Redditch (UK),
- Unicrimp Ltd, based in Tamworth, Staffordshire (UK),
- Sangamo Ltd, based in Paisley (UK),
- Scolmore International Electrical trading LLC based in Dubai,
- Scolmore International Middle East FZE based in Dubai,

- CLICK Scolmore Electrical and Lighting (Hangzhou) Co Ltd based in China,
- Lumen 8 Lighting Ltd based in Hong Kong.

Our Supply Chains

We have established strong and long-lasting relationships with a mix of global market leading manufacturers and local (UK-based) SMEs.

Our tier one suppliers are based in:

- United Kingdom
- Ireland
- Germany
- Bulgaria
- India
- Czechia
- China
- Taiwan
- Vietnam

Our Commitment

Over the course of the past 4 years, we have embedded the Ten Principles of the United Nation Global Compact into strategies and operations, and committed to respecting human and labour rights, safeguarding the environment, and working against corruption in all its forms.

Our dedication to responsible and ethical practices, fostering trust with stakeholders, promoting responsible decision-making, and encouraging a culture of honesty and respect, is outlined in our [Code of Ethics](#).

Our Policies on Slavery and Human Trafficking

Cascading down from our Code of Ethics, we have a number of policies and procedures supporting our anti-slavery commitment. Please see below for an outline of some of these key policies.

The Scolmore Group Code of Ethics

- reflects our core values and commitment to the highest ethical standards.
- applies to our entire workforce, including all full-time and part-time employees, temporary and contract workers, contract workers, officers and members of the Group Board of Directors.
- establishes the expectation that our business partners act with integrity and in compliance with the highest standards outlined in this Code.



The Supplier Code of Conduct

- outlines the expectations and standards we set for our suppliers in relation to social, environmental, and ethical practices.
- reflects our core values and the high ethical standards which inspire our employees, business partners and all other stakeholders.
- incorporates the ten principles of the UN Global Compact, as well as the OECD Guidelines for Multinational Enterprises.
- expresses our vehement opposition to slave and forced labour as well as underage labour defined by the ILO.

The Anti-slavery and Human Trafficking Policy

- in accordance with the Modern Slavery Act 2015, reflects the universal standards crystallised in our Code of Ethics informing the way we conduct our business.
- is intended to give our employees, suppliers, contractors and other business partners guidance on Scolmore's approach to modern slavery and human trafficking; the measures we have taken in order to assess all potential modern slavery risks related to our business; the actions we have in place in order to ensure no slavery or human trafficking occur in our own business and supply chains.
- introduces key performance indicators that measure the effectiveness of our actions to prevent modern slavery across our operations and supply chain.

The Conflict Minerals Policy

- aims at reducing conflict through our sourcing decisions, while constructively engaging with our supply chain.
- outlines our commitment to conducting business in a responsible and sustainable way and requires the same of our workforce, suppliers, contractors and other business partners.

The Sustainable Procurement Policy

- is based on our Code of Ethics as well as on the International Bill of Human Rights and the principles

concerning fundamental rights set out in the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work.

- is in accordance with the OECD Guidelines for Multinational Enterprises.

The Whistleblowing Policy and Procedure

- supports a culture of openness and accountability, essential to prevent situations occurring or to address them when they do occur.
- encourages its employees to report suspected wrongdoings as soon as possible, in the knowledge that their concerns will be thoroughly, and that their confidentiality will be respected.
- provides employees with guidance on how to raise those concerns.
- reassures employees that they should be able to raise genuine concerns in good faith without fear of retaliation, even if they turn out to be mistaken.

Business Partners Due Diligence

To map our **Business Partners**, and the degree of risk they present, we conduct an appropriate level of **Due Diligence** before entering into any trading relationship with them.

The risk level is then periodically re-assessed during our business relationship.

Each Business Partner is assigned a risk level dependent on different criteria, such as the country of incorporation and/or operation, nature of the business (i.e. private vs. public), length of the trading relationship, nature of the goods or services provided, business dependency, and so on. Following checks - which might involve desktop checks, sanction screening - are based on a risk matrix.

Social Audits

Since November 2023, existing quality audits have been coupled with social audits on our stock suppliers. Any non-conformities arising from these audits are being categorised in line with the Ethical Trading Initiative (ETI) Base Codes, adapted to our business model.

- Forced Labour
- Underage Labour
- Discrimination
- Environment
- Working Contracts
- Health and Safety
- Compensation
- Freedom Association
- Miscellaneous

Following a non-conformity, our Compliance and Procurement Teams work directly with the manufacturing plant to drive resolution at root cause.

All audits are conducted by reputable, third-party assessors. All prospect stock suppliers must address any non-conformities before entering in a trading relationship with the Scolmore Group.

Accreditations

EcoVadis

As part of our commitment to society, our people and the environment, Scolmore Group completes a thorough assessment of its business sustainability practices every year through EcoVadis, a global leader in business sustainability assessments. The EcoVadis assessment includes 21 sustainability criteria across four core themes: Environment, Labour & Human Rights, Ethics and Sustainable Procurement. In our latest rating, which was completed in November 2025, we earned a Gold Medal, which places us globally in the top 5% of companies assessed by EcoVadis. This score reflects the quality of the company's sustainability management system and demonstrates a commitment to promoting transparency throughout the value chain.



Our sustainable procurement score rose from 70% in 2024 to 79% in 2025, further strengthening our position well above the industry average.

Year	Sustainable Procurement score	Industry average score
2024	70%	38%
2025	79%	40%

Supply Chain Sustainability School - Gold Membership

Scolmore is a Gold member of the School. The resources within the school, in conjunction with other tools available to the Group, have helped with upskilling our Sustainability champions on general as well as specific construction industry related issues, which includes Modern Slavery. Training conducted through webinars have inspired our sustainability strategy and journey by giving us a look-ahead to better understand the market and regulatory trends.

UN Global Compact Participation

As part of our commitment to sustainable and responsible business practices, in May 2025 we have joined the *United Nations Global Compact* initiative - a voluntary initiative for the development, implementation and disclosure of responsible business practices. As a contributor member, we actively support the initiative

and uphold its Ten Principles, reporting on our progress each year.

[Click here to read our latest Communication on Progress.](#)

The *UN Global Compact* is a call to companies everywhere to align their operations and strategies with *ten universally accepted principles* in the areas of human rights, labour, environment and anti-corruption, and to take action in support of *Sustainable Development Goals (SDGs)*.



Processes for Preventing Slavery and Human Trafficking in Our Business

As an employer operating across multiple regions, we adhere to local employment laws and uphold stringent measures to prevent modern slavery within our business. These safeguards are continually evaluated and refined to drive ongoing improvements. Below is a concise overview of the internal processes and controls we have in place.

Employees

We only recruit individuals with a legal right to work in their respective locations. All offers of employment are subject to the candidate providing the required original documents or for UK-based employees, our organisation being able to carry out a positive check on the Home Office 'online right to work checking service'. To enable us to conduct an online check, the candidate must have shared their right to work details using the Home Office 'prove your right to work to an employer' online service.

The requirement to provide evidence of the right to work in the UK applies to all new recruits, regardless of their race, nationality or ethnic or national origins.

Original identification documents are returned to the employee as soon as onboarding procedures are completed, whereas copies are retained in accordance with the data protection and other applicable regulations.

We engage only with reputable verified employment agencies to source labour on a temporary base.

Awareness and Training

We are actively working to increase awareness around Modern Slavery and Forced Labour.

We do so via our ScolmoreHub, the Group's intranet, and through e-learning training modules available to all employees on the LMS platform, supported by guidance from the International Labour Organization's resources on forced labour [ILO Indicators of Forced Labour](#)

In line with our commitment, all Managers and Directors as well as all staff working in Human Resources, Product Development, Quality, Technical, Procurement, Purchasing, Supply Chain, Projects and Legal & Compliance departments (as well as any other staff member who could come into contact with incidents of modern slavery during the performance of their duties) are required to complete a mandatory training module and are provided with tools enabling them to recognise and address any relevant signs.

All onboarding staff must complete mandatory training within their induction period.

Suppliers' Adherence to Our Values

Compliance with Laws

We expect all our suppliers to conduct their business consistently in compliance with the principles covered in our Supplier Code of Conduct (SCoC) as well as the laws and regulations applicable in the country they operate in. Should there be a conflict between our SCoC and the applicable laws and regulations, we expect our suppliers to meet the most stringent requirements.

Since its launch in July 2022, all suppliers are encouraged to sign the Scolmore Supplier Code of Conduct. This is now a mandatory requirement for all suppliers of goods, products and services.

Transparency

We aim to be transparent in our dealing with our suppliers, and we expect our suppliers to be open and honest in their dealing with us.

Further Steps

Following a review of the effectiveness of the steps we have taken to ensure that there is no slavery or human trafficking in our business or supply chains, we intend to take the following steps to further combat slavery and human trafficking:

- Continue implementation of the new e-learning training module and maintenance of the high completion rate of 85% to ensure awareness of the risk of modern slavery in our Business.
- Continually review the panel of approved recruitment agencies for temporary workers, including sample auditing to further test the strength of the governance controls.
- Review and improve the controls around the approval and onboarding of new non-profiled suppliers.
- Continue to work with strategic suppliers to ensure agreement and adherence to the Scolmore Supplier Code of Conduct.
- Further expand the regularity and scope of the social responsibility audits on our first and second-tier supply chain.

Signed:



Marie Parry

Group Chief Operating Officer on behalf of the board of Directors.

Date: 07.05.2026

This statement, pursuant to section 54.1 of the Modern Slavery Act 2015 and constitute our Slavery and Human Trafficking Statement for the Financial Year ending 30.04.2026 and was approved by the Board of Director of the Scolmore Group on 07.05.2026.